

Health and Safety Audit
(29 CFR 1910.120)
EPA Region X, Emergency Response Unit

Date: 7/18/2012

Site Name/Location: Avery Landing; 46213 St. Joe River Rd.
(~64,000 T) Shoshone Co, ID 83802

Brief Site Description: Soil removal at a former RR maintenance
and refueling facility. Soil contaminated with petroleum product
which is daylighting into river.

OSC: Earl Liverman

H&S Auditor: Andy Smith; PE, CHMM – (OSC) Health and Safety Program Coordinator
and sub contractors

❖ **Health and Safety Plan (HASP)**

- Is there a HASP available on-site? YES; EPA, EQM, ENE
- Has the OSC reviewed and signed off/approved the HASP? YES
- Have all workers on site read and signed off on the plan? YES
- Has there been a health and safety audit conducted on site? NO
- If so by whom/what affiliation? N/A
- Have all identified deficiencies been corrected? N/A

❖ **Does the HASP include an organizational structure showing chain of command with function and responsibilities of [(b)(1)(ii)(A) and (2)(i)(...)]?:?** YES

- Supervisor? [(A)] Earl Liverman - OSC
- Safety Officer? [(B)] John Kiominisky - EQM (will correct to reflect S.O. on site)
- All other personnel? [(C)] _____

❖ **Is there a comprehensive work plan with details of [(b)(1)(ii)(B) and (3)(...)]:**

- Cleanup activities and standard operating procedures [i]? YES

- Defines work tasks and objectives and methods for accomplishing them [ii]? YES

- Personnel requirements (i.e., personnel needed) for implementing [iii]? YES

- Provides for implementation of HAZWOPER training requirements [iv]? YES

- Provides for implementation of informational program on nature, level, and degree of exposure likely from work at site [v]? EPA HASP will be modified to reflect worker exposure (for contractor benefit) as opposed to public exposure concerns.
- Provides for implementation of medical surveillance program [vi]? YES

❖ Site Specific Safety Plan [(b)(1)(ii)(C) and (4)(...)]:

- Has a risk/hazard analysis been completed for each site task and operation [(ii)(A)]? ECRM HASP states this will be accomplished at daily tailgate safety meeting.
- Does Plan ensure employees are assigned to tasks and operations that are consistent to level of HAZWOPER training (i.e., 24 and-, 40-hour) [(ii)(B)]?
- Have all employees received 40 hour HAZWOPER training [(4)(ii)(B)]? YES
 - Is documentation available on site? YES
 - Are all employees current on their 8-hour refresher training? YES
 - Have supervisors or on-site management received an additional 8 hours of specialized training at the time of job assignment? YES
- Does Plan address PPE for each task and operation and is consistent with PPE Program [(ii)(C) reference (G)(5)]?
- Are employees trained in use of PPE? YES
 - PPE selection based upon site hazards?
 - PPE use and limitations of the equipment?
 - Work mission duration?
 - PPE maintenance and storage?

- PPE decontamination and disposal?
 - PPE training and proper fitting?
 - PPE donning and doffing procedures?
 - PPE inspection procedures prior to, during, and after use?
 - Evaluation of the effectiveness of the PPE program?
 - Limitations during temperature extremes, heat stress, and other appropriate medical considerations?
- Does Plan address Medical Surveillance requirements (i.e., a statement to that effect) [(ii)(D), see also (f)]? yes
- Does the Plan address air monitoring, personnel monitoring, and environmental sampling techniques and instruments to be used, including calibration of such instruments [(ii)(E) see also section (h)]?
- Does the Plan address site control measures [(ii)(F) references (d)(3)]?
- Is there a map in the Site-Specific Safety and Health Plan [(d)(3)]? yes
 - Have work zones been defined [(d)(3)]? Weak. work zones described academically but nothing provided specific to site, exclusion zone and support zone needs beefing up.
 - Is there a buddy system in place [(d)(3)]? yes
 - Have site communications been established [(d)(3)]? yes
 - Has a route to the nearest hospital been defined and explained to the crew [(d)(3)]? yes
- Are there written Decon procedures [(ii)(G) references (k)]? Lacks site-specific discussion
- Has it been communicated to employees and is it being implemented [(k)(2)(i)]?
 - Has an SOP been established to minimize contact with hazardous substances and contaminated equipment [(k)(2)(ii)]?
 - Is a procedure in place for decontaminating personnel and equipment [(k)(2)(iii)]?
 - Is Safety Officer monitoring decontamination procedure for effectiveness [(k)(2)(iv)]?
 - Is decon location protective to uncontaminated personnel and equipment [(k)(3)]?
 - Is equipment used for decontaminating properly decontaminated itself or properly disposed of along with any decon solutions [(k)(4)]?
 - Is PPE properly decontaminated or disposed of [(k)(5)]?
 - Does SOP require that when PPE clothing becomes wetted with hazardous substance to immediately decon and shower [(k)(5)]?
 - Does SOP require only authorized personnel to remove PPE clothing and
- yes but discussed academically,

equipment from change room [(k)(6)]?

- If commercial establishments are decontaminating PPE clothing and equipment, have they been informed of potential harmful effects due to exposure to hazardous substances [(k)(7)]?
- Are showers and change rooms required by the decontamination procedures and do they meet the requirements of 29 CFR 1910.141 [(k)(8)]?

➤ Is there an emergency response plan [(ii)(H) references (I)]?

Does it discuss:

- Pre-emergency planning [(2)(i)]? *yes*
- Personnel role, lines of authority, and communication [(2)(ii)]?
- Emergency recognition and prevention [(2)(iii)]?
- Safe distances and places of refuge [(2)(iv)]?
- Site security and control [(2)(v)]?
- Evacuation routes and procedures [(2)(vi)]?
- Decontamination procedures which are not already covered (ii)(G) [(2)(vii)]?
- Emergency medical treatment and first aid [(2)(viii)]?
 - Who on site has first aid/CPR (not required unless emergency medical treatment is not readily available)? *who on site will provide first aid?*
- Emergency alerting and response procedures [(2)(ix)]?
- Critique of response and follow-up [(2)(x)]?
- PPE and emergency equipment [(2)(xi)]?
- Site topography, layout, and prevailing weather conditions [(3)(i)(A)]?
- Procedures for reporting to local, state, and federal agencies [(3)(i)(B)]?

Is the emergency response plan consistent with the following requirements?:

- It is a separate section of the Site Safety and Health Plan [(3)(ii)]
- It is compatible and integrated with the disaster, fire and/or emergency response plans of local, state, and federal agencies [(3)(iii)]
- It has been rehearsed regularly as part of the overall training program for site operations [(3)(iv)]
- It has been reviewed periodically and, as necessary, amended to keep it current with new or changing site conditions or information [(3)(v)]
- An employee alarm system has been installed in accordance with 29 CFR 1910.165 to notify employees of an emergency situation; to stop work activities if necessary; to lower background noise in order to speed communication; and to begin emergency procedures [(3)(vi)]
- It allows, based upon the information available at time of the emergency, the employer to evaluate the incident and the site response capabilities and proceed with the appropriate steps to implement the site emergency response plan [(3)(vii)]?

➤ Are there confined space entry procedures [(ii)(i)]? *N/A*

- Have any confined entry situations been identified?

➤ Is there a spill containment program [(ii)(j) references (J)]? *N/A*

- Is fuel containers inside a containment area? Insure after heavy rain that containment area is empty of rain water. YES

❖ Other issues to watch for

- Is sanitation addressed [e.g., hand washing and toilets]? YES
- Has the local fire department been informed of site operations [Do this if dealing with a situation which might warrant calling fire department, e.g, explosive or flammable material]? N/A
- Has the local hospital been contacted [Do this if dealing with a unique substance that would require further preparation by hospital, e.g., nerve agent, cyanide]? N/A
- Are there compressed gas cylinders on site and are they handled appropriately? no
- Is there a welding operation on site? No
- Is any type of air sampling equipment on site? YES
- Is it maintained and current on all calibrations? _____
- Is there an XRF on site? No
 - Is all the paperwork with the XRF current? N/A
 - Is the XRF kept in a secure location when not in use? N/A
- Is heat or cold stress an issue? Heat
- Is fluid replacement available on site? YES
- Are any flammable materials on site stored appropriately? YES
- Is a lock out tag out program required? NO
- Is an injury log maintained on site? YES
- Are fire extinguishers located in the office, on site, in equipment and are they maintained? YES

- ❖ Other Comments: EPA, EQM, and ENE all have complete HAZOPs.
A safety officer for site needs to be identified.
^(qualified) someone who will provide first aid needs to be identified.
Work zone and decontamination discussion needs to
be brought down from academic/general to site-specific.
The site is tidy and organized. Dust suppression
~~effect~~ effort in place as well as haul truck decontamination.
Flaggers in place. Workers all properly attired
in level-D with reflective vests.

- ❖ Summary of Audit Results: Operation is well run, NO
significant issues.